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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In Re:

MYRTLE HOMOSASSA, LLC,  
  
Debtor.

Chapter 11

Case No. 24-24-41187 (JMM)

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**AFFIRMATION IN SUPPORT OF DEBTOR’S MOTION FOR AN ORDER (I)  
SHORTENING THE TIME PERIOD FOR NOTICE AND (II) SCHEDULING AN  
EXPEDITED HEARING FOR DEBTOR'S AMENDED SALE MOTION**

TO: THE HONORABLE JILL MAZER-MARINO  
UNITED STATES BANKRUPTCY JUDGE

1. H. Bruce Bronson, an attorney duly admitted to practice law in the state of New York and before this Court, affirms the truth of the following pursuant to 28 U.S.C. § 1746, under penalty of perjury.

2. Myrtle Homosassa, LLC, the debtor and debtor-in-possession herein (the “Debtor”), submits this motion (the “Motion to Shorten”) seeking the entry of an order pursuant to Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9077-1(c) of the Local Bankruptcy Rules for the Eastern District of New York (the “Local Rules”), shortening the time period for notice of, and scheduling a hearing on the Debtor’s amended sale motion (the “Amended Sale Motion”).

**JURISDICTION AND VENUE**

3. The Court has jurisdiction to consider this Motion to Shorten time under 28 U.S.C. §§ 157 and 1334, and is a core proceeding under 28 U.S.C. § 157(b)(2). Venue of this proceeding is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

**RELIEF REQUESTED AND BASIS THEREFOR**

4. By this Motion to Shorten, the Debtor seeks to shorten the time period for notice of, and to schedule an expedited hearing on Debtor's Amended Sale Motion.

5. Pursuant to Rule 9006-1(a)(i) of the Local Rules, motions are to be served at least 14 days before the hearing date. The Court, however, has discretion to reduce notice periods for cause shown pursuant to Federal Bankruptcy Rule 9006(c) and Local Rule 9077-1(c).

6. Adequate cause exists to shorten the notice period for Debtor's Amended Sale Motion. The Debtor's purchaser withdrew its offer, and a new purchaser was obtained that has now signed a purchase contract.

7. The Debtor now makes this Motion to Shorten the notice period for its Amended Sale Motion because the secured creditor has lifted the stay and a sale of the Debtor's property is preferable as opposed to a foreclosure sale.

8. Thus, shortening the notice period for the Sale Motion is necessary because it would permit the Debtor to obtain a Sale Order at the earliest possible time to provide enough time for a sale to be consummated.

9. The parties are on notice of the Debtor's intention to sell the property from the previously filed sale motion and will not be prejudiced by the limited notice of the Amended Sale Motion.

10. No request for the relief sought hereunder has been made previously.

WHEREFORE, the Debtor seeks the entry of an order (i) pursuant to Bankruptcy Rule 9006(c) and Local Rule 9077-1(c) shortening the notice period for the Debtor's Sale Motion; (ii) scheduling a hearing on the Sale Motion; and (iii) granting the Debtor such other and further relief as the Court deems just and proper.

Dated: Harrison, NY  
November 17, 2024,

Bronson Law Offices, P.C.

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